

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: Bank of NY Entities
c/o Christian H. Gannon, Esq., Robert R. Rigolsi, Esq. and Jonathan Goldblatt, Esq.
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PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 101 Barclay Street, as referenced in the deposition of Thaddeus (Chip) Logan, on September 10th, 2012, on or about each page as listed below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Any and all un-redacted documents and/or forms of documentation that was turned over during the course of this litigation as part of the discovery procedures that came in redacted form, as requested on or about page 136 in the above referenced deposition.
2. Any and all un-redacted documentation regarding a project team meeting which took place on October 22nd, 2001. Further, a list of all and/or any attendees that attended the team meeting on October 22nd, 2001 on behalf of the L&D Electric, Tishman, LawGibb,

Donaldson Acoustics, Trade-Winds, Cushman & Wakefield and Bank of New York, as requested on or about page 136 in the above referenced deposition.

3. Any un-redacted documentation and/or logs and/or shop stewards reports and/or list of all employees kept outside or inside by Trade Winds Environmental during the course of their decontamination work at 101 Barclay Street, as requested on or about page 190 in the above referenced deposition.
4. All emergency plans provided in un-redacted form in effect on and after September 11th, 2001. Additionally, including but not limited to all building plans and/or drawings reflective of the ductwork and/or engineer's logs and/or the window replacement reports provided in un-redacted form. Further, all redacted documents need to be provided with un-redacted form, as requested on or about page 248 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27th, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: 

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